

WALLACE WU (State Bar No. 220110)  
Wallace.Wu@arnoldporter.com  
OSCAR RAMALLO (State Bar No. 241487)  
Oscar.Ramallo@arnoldporter.com  
STEPHANIE KANG (State Bar No. 306162)  
Stephanie.Kang@arnoldporter.com  
LAURA WATSON (State Bar No. 317155)  
Laura.Watson@arnoldporter.com  
SKYLAR WILLIAMS (State Bar No. 341028)  
Skylar.Williams@arnoldporter.com  
Arnold & Porter Kaye Scholer LLP  
777 South Figueroa Street, 44<sup>th</sup> Floor  
Los Angeles, CA 90017-5844  
Telephone: (213) 243-4000  
Facsimile: (213) 243-4199

*Attorneys for Plaintiff and Counter-Defendant*  
**ARTURO SANTOS GARCIA**

*[Additional Counsel on Signature Block]*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

ARTURO SANTOS GARCIA,

Plaintiff,

v.

ROBERTO VARGAS HERNANDEZ,

Defendant.

Case No. 8:23-cv-946-CJC(JDEx)

**JOINT NOTICE OF  
SETTLEMENT**

**JOINT NOTICE OF SETTLEMENT**

Pursuant to the Court’s March 27, 2024 order (Dkt.#64), Plaintiff and Counterclaim Defendant Arturo Santos Garcia. (“Plaintiff”) and Defendant and Counterclaimant Roberto Vargas Hernandez. (“Defendant”) (collectively, the “Parties”) hereby provide notice of settlement.

On March 25, 2024, the Parties entered into a fully executed written settlement agreement resolving all claims and counterclaims. The settlement agreement requires certain obligations to be performed within forty-five (45) days of its execution (May 9, 2024). Once these obligations have been fully performed, the settlement agreement requires the Parties to file within five court days a joint request to dismiss the entire action with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

In order to allow the Parties to satisfy their obligations under the settlement agreement, the Parties have concurrently filed a Joint Stipulation respectfully requesting the Court stay this action for fifty-two (52) days to June 16, 2024.

DATED: March 28, 2024

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Wallace Wu

Wallace Wu

Oscar Ramallo

Stephanie Kang

Laura Watson

Skylar Williams

*Attorneys for Plaintiff and Counter-  
Defendant ARTURO SANTOS GARCIA*

1 DATED: March 28, 2024

Respectfully submitted,

2 PAYNE & FEARS LLP

3  
4 By: /s/ Alejandro G. Ruiz

5 Alejandro G. Ruiz, Bar No. 271999

6 agr@paynefears.com

7 Connor L. Kridle, Bar No. 345476

8 clk@paynefears.com

9 4 Park Plaza, Suite 1100

10 Irvine, California 92614

11 Telephone: (949) 851-1100

12 Facsimile: (949) 851-1212

13 *Attorneys for Defendant and Counter-*  
14 *Claimant ROBERTO VARGAS*  
15 *HERNANDEZ*

16 **ATTESTATION**

17 I hereby attest that all signatories listed above, on whose behalf this notice is  
18 submitted, concur in the filing's content and have authorized the filing.

19 By: /s/ Wallace Wu

20 Wallace Wu